

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

GEOFFREY VARGA and MARK LONGBOTTOM, as Joint Official Liquidators of Bear Stearns High-Grade Structured Credit Strategies (Overseas) Ltd. and Bear Stearns High-Grade Structured Credit Strategies Enhanced Leverage (Overseas) Ltd.,)	13 Civ. 08743 (LGS)
Plaintiffs,)	
v.)	
McGRAW HILL FINANCIAL, INC. (f/k/a THE McGRAW-HILL COMPANIES, INC. and d/b/a STANDARD & POOR'S RATING SERVICES), STANDARD & POOR'S FINANCIAL SERVICES LLC, MOODY'S CORPORATION, MOODY'S INVESTORS SERVICE, INC., MOODY'S INVESTORS SERVICE LIMITED, FITCH GROUP, INC., FITCH RATINGS, INC. (f/k/a FITCH, INC.), and FITCH RATINGS LIMITED,)	
Defendants,)	
BEAR STEARNS HIGH-GRADE STRUCTURED CREDIT STRATEGIES MASTER FUND, LTD. and BEAR STEARNS HIGH-GRADE STRUCTURED CREDIT STRATEGIES ENHANCED LEVERAGE MASTER FUND, LTD.,)	
Nominal Defendants.)	

NOTICE OF MOTION

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Plaintiffs' Motion to Remand for Lack of Subject Matter Jurisdiction, dated December 26, 2013, submitted herewith, Plaintiffs will move this Court at the United States Courthouse, 40 Foley Square, Courtroom 506, New York, New York, at a date and time to be determined by the Court, for an Order, pursuant to 28 U.S.C. §§ 1447(c), remanding this case to the Supreme Court of the State of New York, County of New York, for lack of subject matter jurisdiction.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Scheduling Order dated December 26, 2013, opposition papers, if any, must be served on or before January 16, 2014, and reply papers, if any, must be served on or before January 27, 2014.

Dated: December 26, 2013
New York, New York

Respectfully submitted,

REED SMITH LLP

By: /s/ Jordan W. Siev

James C. McCarroll
Jordan W. Siev
C. Neil Gray
599 Lexington Avenue
New York, New York, 10022
Tel: (212) 521-5400
Fax: (212) 521-5450
Email: jmccarroll@reedsSmith.com
jsiev@reedsSmith.com
cgray@reedsSmith.com

Attorneys for Plaintiffs